

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

IN RE:	§	
	§	
STANLEY THAW,	§	CASE NO. 11-43603
	§	(Chapter 7)
DEBTOR	§	

TRUSTEE'S SECOND MOTION TO EXTEND TIME TO OBJECT TO DISCHARGE

TO THE HONORABLE BRENDA T. RHOADES, U.S. BANKRUPTCY JUDGE:

Christopher J. Moser, the Chapter 7 Trustee herein ("Trustee") files his Second Motion to Extend Time to Object to Discharge ("Motion") as follows:

1. On December 2, 2011 (the "Date of Bankruptcy"), Stanley Thaw ("Debtor") filed a voluntary petition under Chapter 7 of the Bankruptcy Code.
2. Christopher J. Moser is the acting Chapter 7 Trustee of the Debtor's bankruptcy estate.
3. The original meeting of creditors was scheduled for January 6, 2012. The Trustee did not conclude the Debtor's meeting of creditors at that time due to issues raised at the meeting that required additional information from the Debtor. The meeting was reset to March 2, 2012. The Debtor could not appear at that meeting due to the Debtor's medical issues. The meeting was reset to March 2, 2012. The meeting was held and concluded on that date.
4. The Trustee filed a motion to extend the original bar date to file an objection under The deadline to file objections to discharge under §523 and §727 on February 24, 2012. The bar date was extended to May 6, 2012 by order of the court.
5. The Debtor appears to have been involved in several complex million dollar real estate transactions. The Trustee needs additional time to fully investigate the financial affairs of the Debtor. The Trustee has requested the Debtor to provide additional financial information and

documents related to pre-bankruptcy transactions and matters pertaining to property of the bankruptcy estate. Although the Debtor has provided some documentation, there remains additional information that the Trustee has requested.

6. Trustee seeks a sixty (60) day extension of the deadline to file an objection to the Debtor's discharge under §727 of the Bankruptcy Code. During the sixty (60) days, Trustee will continue to investigate the Debtor's financial affairs to determine if grounds exist to pursue such an action.

7. Trustee requests that the deadline for the Trustee and/or the U.S. Trustee to object to the Debtor's discharge be extended for an additional sixty (60) days, from May 6, 2012 to July 5, 2012.

WHEREFORE, PREMISES CONSIDERED Trustee prays that this Court grant the Motion and that Trustee be granted such other and further relief to which he may be justly entitled.

Respectfully submitted,

QUILLING, SELANDER, LOWNDS,
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By: /s/ Christopher J. Moser
Christopher J. Moser

ATTORNEYS FOR TRUSTEE

NOTICE

NO HEARING WILL BE CONDUCTED HEREON UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AND SERVED UPON THE PARTY FILING THIS PLEADING WITHIN TWENTY ONE (21) DAYS FROM THE DATE OF SERVICE HEREOF UNLESS THE COURT SHORTENS OR EXTENDS THE TIME FOR FILING SUCH RESPONSE. IF NO RESPONSE IS TIMELY SERVED AND FILED, THIS PLEADING SHALL BE DEEMED TO BE UNOPPOSED AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT. IF A RESPONSE IS FILED AND SERVED IN A TIMELY MANNER, THE COURT WILL THEREAFTER SET A HEARING. THE COURT RESERVES THE RIGHT TO SET A HEARING ON ANY MATTER.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion has been served via regular U.S. mail, postage prepaid, on this 1st day of May, 2012 upon the following:

United States Trustee
300 Plaza Tower
110 North College Avenue
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/s/ Christopher J. Moser